

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

*PLAINTIFF,*

v.

THE STATE OF TEXAS; GREG ABBOTT IN  
HIS OFFICIAL CAPACITY AS GOVERNOR OF  
TEXAS; TEXAS DEPARTMENT OF PUBLIC  
SAFETY; STEVEN C. MCCRAW, IN HIS  
OFFICIAL CAPACITY AS DIRECTOR OF TEXAS  
DEPARTMENT OF PUBLIC SAFETY,

*DEFENDANTS.*

CASE NO. 1:24-CV-00008-DAE (LEAD CASE)

CONSOLIDATED WITH 1:23-CV-1537-DAE

**JOINT MOTION OF ALL PARTIES  
TO STAY TRIAL PROCEEDINGS PENDING APPEAL**

All Plaintiffs and Defendants in both cases consolidated in this action<sup>1</sup> respectfully request a stay of all trial court deadlines and proceedings. The requested stay would expire 30 days after issuance of any mandate back to this Court after resolution of the appeal of the preliminary-injunction order entered in this case, but any party could move the Court to lift the stay at any time.

Good cause exists for a stay. Currently, the grant of a preliminary injunction by this Court has been appealed, with proceedings currently ongoing in the U.S. Court of Appeals for the Fifth Circuit. ECF No. 49. The Fifth Circuit's (and, possibly, the Supreme Court's) review of the preliminary injunction order is likely to substantially affect subsequent proceedings in this

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<sup>1</sup> Plaintiffs are the United States of America (in Case No. 1:24-cv-8) and Las Americas Immigrant Advocacy Center, American Gateways, and the County of El Paso (in Case No. 1:23-cv-1537). Defendants in Case No. 1:24-cv-8 are the State of Texas; Greg Abbott, in his official capacity as Governor of Texas; Texas Department of Public Safety; and Steven C. McCraw, in his official capacity as Director of Texas Department of Public Safety. Defendants in Case No. 1:23-cv-1537 are Steven C. McCraw, in his official capacity as Director of Texas Department of Public Safety and Bill D. Hicks, in his official capacity as District Attorney for the 34th Judicial District of Texas.

litigation. Accordingly, staying all proceedings in these consolidated cases in this Court will conserve the parties' and the Court's resources. A proposed order is attached.

Date: April 19, 2024

Respectfully submitted.

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**CERTIFICATE OF SERVICE**

On April 19, 2024, this document was filed electronically through the Court's CM/ECF system, which automatically serves all counsel of record.

/s/ Ryan D. Walters  
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